

FILED

MAY 01 2019

Clerk, U.S. District Court
District Of Montana
Great Falls

JEFFREY K. STARNES
Assistant U.S. Attorney
U.S. Attorney's Office
P.O. Box 3447
Great Falls, MT 59403
119 First Ave. N., Suite 300
Great Falls, MT 59401
Phone: (406) 761-7715
Fax: (406) 453-9973
E-mail: jeff.starnes@usdoj.gov

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FABJAN ALAMETI,

Defendant.

CR 19-13 -BU-DLC

INDICTMENT

**FALSE STATEMENT TO A FEDERAL
OFFICER IN A MATTER INVOLVING
TERRORISM (Counts I-III)**
Title 18 U.S.C. § 1001
(Penalty: 8 years imprisonment, \$250,000
fine, and three years of supervised release)

**POSSESSION OF A FIREARM BY AN
UNLAWFUL USER OF A CONTROLLED
SUBSTANCE (Count IV)**
Title 18 U.S.C. § 922(g)(3)
(Penalty: 10 years imprisonment, \$250,000
fine, and three years of supervised release)

THE GRAND JURY CHARGES:

COUNT I

That on or about March 25, 2019, at or near Bozeman, in Gallatin County, in the State and District of Montana, the defendant, FABJAN ALAMETI, willfully and knowingly made a materially false, fictitious, and fraudulent statement in a matter involving international and domestic terrorism, and in a matter within the jurisdiction of a department and agency of the United States, by stating to FBI Special Agent Matthew Deurmeier that he, FABJAN ALAMETI, "had never talked about traveling overseas to fight for ISIS," or words to that effect, which statement was false because, as FABJAN ALAMETI then and there knew, that between in or about December, 2017, and in or about March, 2019, he utilized a Facebook account and other means of electronic communication to tell individuals both known and unknown to the Grand Jury, that he wanted to travel overseas and fight for ISIS, or words to that effect, in violation of 18 U.S.C. § 1001.

COUNT II

That on or about March 25, 2019, at or near Bozeman, in Gallatin County, in the State and District of Montana, the defendant, FABJAN ALAMETI, willfully and knowingly made a materially false, fictitious, and fraudulent statement in a matter involving international and domestic terrorism, and in a matter within the jurisdiction of a department and agency of the United States, by stating to FBI Special Agent Matthew Deurmeier that he, FABJAN ALAMETI, "did not have

any desire to hurt people with guns," or words to that effect, which statement was false because, as FABJAN ALAMETI then and there knew, that on or about March 15, 2019, he utilized a means of electronic communication to tell individuals both known and unknown to the Grand Jury, that he wanted to "attack random people to avenge the blood" of Muslims killed in Christchurch, New Zealand, and that he was "going to Montana and gonna [sic] buy a gun since all they need is a background check and id [sic]," or words to that effect, in violation of 18 U.S.C. § 1001.

COUNT III

That on or about March 25, 2019, at or near Bozeman, in Gallatin County, in the State and District of Montana, the defendant, FABJAN ALAMETI, willfully and knowingly made a materially false, fictitious, and fraudulent statement in a matter involving international and domestic terrorism, and in a matter within the jurisdiction of a department and agency of the United States, by stating to FBI Special Agent Matthew Deurmeier that he, FABJAN ALAMETI, "has never said that he wanted to hurt any Americans or anyone in the military" or words to that effect, which statement was false because, as FABJAN ALAMETI then and there knew, that between in or about January and in or about February, 2019, FABJAN ALAMETI utilized a Facebook account and other means of electronic communication to tell individuals both known and unknown to the Grand Jury, that

he was, "willing to conduct an attack in the United States," that his ideal target was, "any military facilities or simply a recruiting center," and that if he could not make a bomb "then the guns are the ideal weapon," or words to that effect, in violation of 18 U.S.C. § 1001.

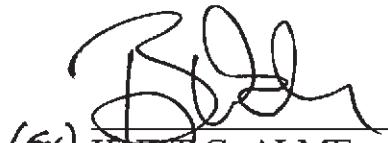
COUNT IV

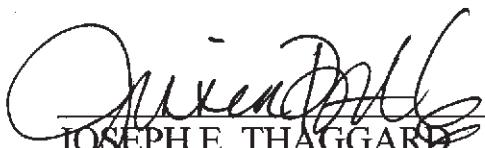
That on or about April 3, 2019, at or near Bozeman, in Gallatin County, in the State and District of Montana, the defendant, FABJAN ALAMETI, knowingly possessed, in and affecting interstate commerce, a firearm, namely a Springfield Armory M1A semi-automatic rifle (serial number 388887), and, at the time he possessed the firearm, he was an unlawful user of a controlled substance, that is marijuana, in violation of 18 U.S.C. § 922(g)(3).

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON


(for) KURT G. ALME
United States Attorney


for
JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons _____
Warrant: _____
Bail: _____

In Federal Custody
Arraignment
May 6, 2019 at 1:30pm
MSla, MT